(1)

Supreme Court, U.S.
FILED

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CASE NO. _____

IN THE
Supreme Court of the United States of America

ROBERT KAHRE; JOHN NELSON
Petitioners
vs.
IMF, THE WORLD BANK, ET AL.

ON PETITION FOR WRIT OF CERTIORARI
TO THE
SUPREME COURT OF THE
STATE OF NEVADA AND
UNITED STATED DISTRICT COURT FOR THE
DISTRICT OF NEVADA

PETITION FOR WRIT OF CERTIORARI

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38 pp

QUESTIONS PRESENTED FOR REVIEW

1. Did the U.S. District Court unlawfully assume jurisdiction over a case in which the International Monetary Fund (IMF) was a party, and in contravention of the Articles of Agreement of the International Monetary Fund, Article IX, Section 3, 60 Stat. 1413?

2. Did the United States District Court unlawfully assume jurisdiction over the IMF and the International Bank For Reconstruction And Development (The World Bank) when the United States does not own more than fifty (50%) percent of the voting share stock in the instrumentalities, and in contravention of 28 U.S.C. 1349?

3. Do the judges of the U.S. District Court have subject matter jurisdiction over the "Exchange Stabilization Fund" (ESF) as created under the Gold Reserve Act of 1934, Section 10(b), and as amended by the Special Drawing Rights Act of 1968?

4. Does the State Court have jurisdiction over the IMF and The World Bank as instrumentalities and its corporators in accordance with the Foreign Sovereign Immunities Act, 28 U.S.C. 1605(a)(2)?

5. Are the immunities and powers granted to the International Monetary Fund (IMF) in contravention of the Constitution for the United States of America, and if so, can Congress created a corporate entity that is not "under Authority of the United States", grant it special privileges, immunities, and franchises, become a corporate stockholder and member, and thereafter devise a systematic scheme to do not only what their legislative powers do not authorize but what they forbid.

PARTIES TO ACTION BELOW

PLAINTIFFS BELOW

THE PEOPLE OF THE STATE OF NEVADA, EX REL, CITIZEN ROBERT KAHRE, THE AMERICAN NATIONAL PEOPLE, THE PEOPLE OF THE STATE OF COLORADO, SUI JURIS, JOHN B. NELSON

Robert Kahre	John B. Nelson
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DEFENDANTS & RESONDENTS BELOW

a) THE INTERNATIONAL MONETARY FUND (IMF)
b) THE INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT (THE WORLD BANK)
c) THE DE FACTO UNITED STATES, AS CORPORATOR AND ALTER EGO
d) CEDRICK NELSON
e) WALT BUDZINSKI
f) BRIAN P. McMAHON
g) RON SMITH
h) WHITTIER HOMES
i) BUD MAHAS
j) UNITED CONSTRUCTION CO., INC.
k) RICHMOND AMERICAN HOMES OF NEVADA
l) REMINGTON HOMES
m) CONAM MANAGEMENT
n) NEVADA STATE BANK
o) PHILLIP M. PRO

p) KATHRYN E. LANDRETH
q) KAREN L. BAKER
r) THOMAS K. KUMMER
s) MARK A. CYMROT
t) ADAM K. DERMAN
u) JOHN M. SULLIVAN
v) GORDON E. BYWATER
w) KIRK B. LENHARD
x) JOHN L. THORNDAL
y) ERVEN T. NELSON
z) PETER DOBOWSKY
aa) STEPHEN S. SPRINKEL
bb) RUTH L. COHEN
cc) BLAIR C. PARKER
dd) DE FACTO STATE OF NEVADA
ee) STATE INDUSTRIAL INSURANCE COMPANY
ff) DALE MORRIS
gg) ALISA R. MARGOLIS
hh) DAVID W. HAGEN
ii) DOUGLAS R. MALAN
jj) HENRY C. KIM
kk) JAN J. COHEN
ll) PHILIP L. KREITLEIN
mm) EMPLOYMENT SECURITY DIVISION
nn) NANCY SAMON
oo) BECKY JONES
pp) ROBERT KING
qq) KAY BARBER
rr) ROBERT MACKE
ss) KATHY L. DRAPER
tt) GARY BAUER
uu) SHARON PETERS
vv) LLOYD D. GEORGE

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Petitioners, Robert Kahre and John B. Nelson, pray that a Writ of Certiorari issue to review the March 8, 1999 Order of the Nevada Supreme Court entered in Kahre v. IMF, et al., Case No. 33601, **Apdx. A1-A5** (which denied Petitioners' application for a writ of certiorari, and which also dismissed related appeals, Case Nos. 33419 and 33684 before the Nevada Supreme Court), and related Orders, as follows: the April 27, 1994 Order issued by State District Court, Don Chairez in Case No. A323777, **Apdx. C29-C30**; all Orders and/or judgments issued and or entered in the records of USDC Case No. CV-S-93-1054-PMP, including, but not limited to, the January 10, 1994 Order entered by Philip M. Pro in the records of USDC Case No. CV-S-93-1054-PMP, **Apdx. D31-D33**; the January 11, 1994 Order entered by Philip M. Pro in the records of USDC Case No. CV-S-93-1054-PMP, **Apdx. E34-E35**; the August 30, 1994 Order entered by David Hagen in the records of USDC Case No. CV-S-93-1054-PMP, **Apdx. F36-F37;** the Order entered January 3, 1995 by USDC, Lloyd D. George, III in USDC Case No. CV-S-93-1054 LDG, **Apdx. H40-H41**; the Order entered February 16, 1995 by USDC, Lloyd D. George, III, in Case CV-S-93-1054 LDG, **Apdx. G38-G39**; and any and all Orders/judgments issued and/or entered in the records of USDC Case CV-S-94-1009 LDG, including, but not limited to, the Order entered February 24, 1995 by USDC, Lloyd D. George, III, in Case CV-S-94-1009 LDG, **Apdx. I42-I45**.

Petitioners also pray that a Writ of Certiorari issue to review whether the immunities and powers granted to the International Monetary Fund (IMF) are in contravention of the Constitution for the United States of America, and if so, can Congress created a corporate entity that is not "under Authority of the United States", grant it special privileges,

immunities, and franchises, become a corporate stockholder and member, and thereafter devise a systematic scheme to do not only what their legislative powers do not authorize but what they forbid. See Article IX of the Articles of Agreement of the International Monetary Fund, **Apdx. U97-U99**.

The March 8, 1999 judgment (**Apdx. A1-A5**) finally denied Petitioner both a Writ of Certiorari and regular appellate review of the case. Petitioners sought issuance of a Writ of Certiorari from the Nevada Supreme Court to review the proceedings below and determine, among other issues presented, if: (1) the case had been unlawfully and improvidently removed from the State District Court, County of Clark, State of Nevada ("State District Court") to the U.S. District Court ("USDC"); (2) if the courts of the State had jurisdiction over the person of the defendants; and (3) if courts of the State had jurisdiction over the subject matter in issue. References herein to "CR" are to the Clerk's record in the applicable case referred to. References to "Apdx." are to the Appendix to this Petition, which is found in a separate volume as provided herewith.

CASE HISTORY & OPINIONS BELOW

1. On October 5, 1993, Plaintiff, Robert Kahre exercised his secured right to commence an action in the Eighth Judicial District Court, County of Clark, State of Nevada ("State District Court") by filing the "Verified Complaint for Declaration in Trespass, Case, Replevin & Assumpsit, Petition for Injunction and Trial by Jury" ("Original Complaint") in the State District Court. Constitution for the United States of America, Article IV, Section 2; Corfield v. Coryell, 6 Federal Cases 546 (1823). The State District

Court case was designated as Case No. A323777.

2. Respondent, State District Court, had original jurisdiction over all the parties and the subject matter in issue as a matter of law, and as hereinafter set forth.

3. On October 26, 1993, Kathryn E. Landreth/Karen Lynn Baker, on behalf of the "United States", filed a Notice of Removal and unlawfully attempted to remove the case to the United States District Court, District of Nevada ("USDC"), and being joined by other named Defendants, attempted to have the case dismissed by USDC judges. The unlawfully removed case was assigned USDC Case No. CV-S-93-1054 PMP (LRL).

4. As hereinafter set forth, Petitioners continually objected in the State District Court to the unlawful removal of the case upon grounds of lack of jurisdiction over the person of the Defendants and over the subject matter in issue, and that the improvident and unlawful removal was intended to abrogate Petitioners' right to trial by jury as secured by the Constitution for the United States of America, Amendment VII. No hearings were ever held in the USDC cases cited herein. See "Denial of Waiver of Jurisdiction; Objection to Removal and to Extension of Time and Praecipe" in the records of State District Court Case No. A323777, CR #25.

5. On November 26, 1993, USDC, Philip Pro, absent jurisdiction, issued an Order in USDC Case No. CV-S-93-1054 PMP (LRL), CR# 23, denying Kahre's Objection to Removal.

6. On December 7, 1993, Kahre filed the "Amended Complaint and Praecipe; Objection to Philip M. Pro Pursuant to 18 U.S.C. §§ 219, 912 - Public Law 471, Chapter 456; Order of Recusal" ("first Amended Complaint") in the State District Court, containing specific allegations as against USDC, Philip M. Pro. See Case No. A 323777, CR# 39.

7. On December 8, 1993, John B. Nelson entered the case. See Case No. A 323777, Special Appearance, CR# 41.

8. On January 10 and January 11, 1994 Respondent, USDC, Philip M. Pro exceeded and usurped powers not delegated to the USDC and entered Orders in the records of USDC Case No. CV-S-93-1054-PMP, CR#s 37 and 38, granting several motions to dismiss. See **Apdx. D31-D33, E34-E35**.

9. The Orders of January 10 and January 11, 1994, entered in USDC Case No. CV-S-93-1054-PMP are null and void for want of jurisdiction as hereinafter set forth.

10. The Orders of dismissal condone and further the admitted unlawful acts and omissions of Defendants. The Orders of January 10 and January 11, 1994, are not appealable but are subject to Writ of Certiorari, or other appropriate Writ.

11. On March 3, 1994 Kahre filed the "Amended Complaint for Surrejoinder for Declaration in Trespass, Case, Replevin & Assumpsit, Petition for Injunction and Trial by Jury" ("second Amended Complaint"), Case No. A 323777, CR# 62, adding several new parties to the case, as well as Petitioner John B. Nelson, herein.

12. On April 18, 1994, a hearing was held before State District Court judge, Don P. Chairez, who refused to take jurisdiction of the case and to determine the merits as required by Public Law 88-663, 78 Stat. 1009, Part III, Section 301(d)(4). Chairez made statements that indicated that his decision was based upon certain coercive influences of certain defendants. (**Apdx. B20, line 20 - B23, line 10**, Transcript of April 18, 1994).

13. On April 27, 1994, State District Court, Don Chairez, issued an Order striking Appellants' second Amended

Complaint, and dismissing the action. See Case No. A 323777, CR#s 82 - 115, **Apdx. C29-C30**.

14. On May 24, 1994, Petitioners filed the "Petition for Reconsideration with Conclusions of Law and Fact", State District Court Case No. A323777, CR # 118, wherein they moved Don P. Chairez to issue a written Order giving conclusions of law and fact to support his determination.

15 On August 30, 1994, USDC, David Hagen, exceeded and usurped powers not delegated to the inferior USDC and unlawfully Ordered removed Case No. CV-S-93-1054 LDG dismissed. **Apdx. F36-F37**, U.S. District Court Order, August 30, 1994, CR # 93.

16. No hearings were ever held in USDC Case No. CV-S-93-1054 LDG.

17. The Order of August 30, 1994, is null and void for want of jurisdiction as hereinafter set forth.

18. The Order of August 30, 1994, is subject to Writ of Certiorari, or other appropriate Writ.

19. On October 27, 1994, Petitioners filed the "Third Amended Complaint; Pluries summons and Notice Petition for Writ of Capias" ("third Amended Complaint"). The case was reactivated in the State District Court. See Case No. A 323777, CR#s 131, 132.

20. On November 17, 1994, Kathryn E. Landreth/Alisa R. Margolis, filed a Notice of Removal and again unlawfully attempted to remove the case to the USDC, District of Nevada. The case was assigned USDC Case No. CV-S-94-01009-HDM (RJJ).

21. On January 3, 1995 USDC, Lloyd D. George, III, exceeded and usurped powers not delegated to the inferior U.S. District Court and unlawfully Ordered removed Case No. CV-S-93-1054 LDG dismissed, as well as striking the Third "Amended Complaint; Pluries summons and Notice

Petition for Writ of Capias", and directing Clerk to not file any of Plaintiff/Appellant Kahre's papers absent leave of court. (**Apdx. H40-H41**, U.S. District Court Order, January 3, 1995, CR# 104).

22. No hearings were ever held in the USDC Case No. CV-S-93-1054 LDG.

23. The Order of January 3, 1995, is null and void for want of jurisdiction as hereinafter set forth.

24. The Order of dismissal condones and furthers the admitted unlawful acts and omissions of Defendants. The Order of January 3, 1995, is not appealable but is subject to Writ of Certiorari, or other appropriate Writ.

25. On February 16, 1995, USDC, Lloyd D. George, III, exceeded and usurped powers not delegated to the inferior USDC and unlawfully Ordered the removed Case No. CV-S-93-1054 LDG dismissed as against a certain Defendant. (**Apdx. G38-G39**, Order of February 16, 1995, Case No. CV-S-93-1054 LDG, CR# 107).

26. The Order of February 16, 1995, is null and void for want of jurisdiction as hereinafter set forth.

27. The Order of dismissal condones and furthers the admitted unlawful acts and omissions of Defendants. The Order of February 16, 1995, **Apdx. G38-G39**, is not appealable but is subject to Writ of Certiorari, or other appropriate Writ.

28. On February 24, 1995, USDC, Lloyd D. George, III, exceeded and usurped powers not delegated to the inferior USDC and unlawfully Ordered the removed Case CV-S-94-1009 LDG dismissed . (**Apdx. I42-I45**, Order of February 24, 1995, CV-S-94-1009 LDG, Docket No. 9).

29. No hearings were ever held in the USDC Case No. CV-S-94-1009 LDG. The Order of February 24, 1995, is null

and void for want of jurisdiction as hereinafter set forth. The Order of dismissal condones and furthers the admitted unlawful acts and omissions of Defendants.

30. The Order of February 24, 1995, is not appealable but is subject to Writ of Certiorari, or other appropriate Writ.

31. On February 28, 1995, a hearing was held before State District Court, Lee Gates in Case No. A323777.

32. Although the hearing was scheduled, and certain jurisdictional documents were subpoenaed by Petitioners, none of the Defendants nor their attorneys appeared, nor were the subpoenaed documents produced, indicating that there were in fact back room ex parte meetings and communications between the judges and Defendants' attorneys. A written Order was entered in the records of State District Court No. A323777 on May 4, 1995. (**Apdx. J46-J48**, Order of May 4, 1995). Also see Case No. A323777, CR#s 201 - 219.

33. The Order of May 4, 1995 only pertained to Defendants Bud Mahas and Douglas R. Malan, and dismissed the case with prejudice against said Defendants "because this case was removed to Federal Court."

34. In the Order of May 4, 1995, Respondent, Lee Gates also awarded sanctions against Plaintiff Robert Kahre "in the form of attorney's fees in the amount of $2929.00 and costs in the amount of $158.00." Petitioners were not served with this Order.

35. The Order as entered on May 4, 1995 in State District Court Case No. A323777, is not appealable but is subject to Writ of Certiorari, or other appropriate Writ.

36. On August 23, 1995, Petitioners filed a Notice of Appeal to the Nevada Supreme Court, which was assigned Case No. 27558. See State District Court Case A323777, CR#249.

37. On September 28, 1995, Plaintiff appealed the case on writ process to the Supreme Court of the State of Nevada, Case No. 27521, seeking an Order of the Supreme Court commanding that a written Order be issued and entered in the State District Court records, and for other relief upon jurisdictional grounds.

38. The Nevada Supreme Court issued its Order in Case No. 27558 on November 21, 1995, determining that: (1) there were "several jurisdictional defects"; (2) that there was "no written order" in the record which "removes this matter to federal district court."; and (3) that the case was "technically still pending in the district court." (**Apdx. K49-K53**, Case No. 27558, Order of November 21, 1995).

39. On June 28, 1997, Case No. A323777 was reassigned to State District Court judge Stephen Huffaker, CR# 264. Stephen Huffaker at all times had reasonable access to the pleadings and evidence in the case and to the public records cited by Petitioners.

40. On or about September 1, 1998, Plaintiff, Robert Kahre filed a Fourth Amended Complaint in State District Court Case No. A323777, CR# 265, and served it on the named parties. No due process requirements were met by the additional Defendants, who were engaged in the same unlawful acts and omissions as the previously named Defendants.

41. On October 19, 1998, a hearing was held before State District Court, Stephen Huffaker upon the motion of Defendants, Nevada State Bank and Gordon Bywater. A transcript of said proceedings is attached hereto as **Apdx. L54-L56** and made part hereof.

42. The World Bank and IMF's attorney, Thomas Kummer, and U.S. Attorney, Kathryn Landreth were both served with subpoenas to appear at the October 19, 1998

hearing and once again produce certain jurisdictional documents. The State District Court Clerk's Office refused to file the served subpoenas.

43. Respondent, Stephen Huffaker refused to hear any arguments by the parties and dismissed the case against Nevada State Bank and Gordon Bywater, with prejudice. None of the subpoenaed documents were produced by the Defendants.

44. The Order of October 21, 1998 was drafted by Defendant, Nevada State Bank and Gordon Bywater's attorney and submitted for Respondent, Huffaker's approval and signature. The Order was entered in the records of the case on October 21, 1998. (**Apdx. M57-M59**, Order of October 21, 1998).

45. On November 9, 1998, another hearing was held before Respondent, Stephen Huffaker upon motion of Defendants Bud Mahas and Richard Malan. The World Bank and IMF's attorney, Thomas Kummer, joined in the motion and appeared in the Court to assist his associates and agents. A transcript of the proceedings is attached hereto as **Apdx. N60-N64** and made part hereof.

46. At the November 9, 1998 hearing, Stephen Huffaker had been duly presented with the issues concerning jurisdiction which were placed before the State Court by Petitioners, and, while ignoring both the issues of fact and the Law, did dismiss Case No. A 323777, and further, entered sanctions of $1000 FRNs in favor of Susan Scann and $500 FRNs in favor of joining defendants.

47. At the November 9, 1998 hearing in Case No. A323777, Stephen Huffaker refused to hear arguments by Petitioners, while allowing attorney Susan Scann to present her issues, and further, complained of the amount of evidence that was submitted by Petitioners which included the

Constitution and Public Laws of the United States, and supreme court determinations. Stephen Huffaker based his determination on determination of the court from the February 28, 1995 hearing and subsequent May 4, 1995 Order (See **Apdx. J47**), which in turn based its determination on the unlawful and improvident removal of the Case to the USDC. (**Apdx. N61, line 10 - N62, line 8**, Transcript of November 9, 1998).

48. At the November 9, 1998 hearing, Thomas Kummer asked Respondent, Stephen Huffaker, if he should write up the Order for Stephen Huffaker. Stephen Huffaker thereafter directed The World Bank and IMF's attorney to draft and submit the Order of the Court for Stephen Huffaker's approval and signature.

49. On November 25, 1998, Petitioners filed the "Petition to Reconsider Order of October 21, 1998 and Unentered Order of November 9, 1998", Case No. A323777, CR# 360, setting forth the reasons why the State Court should determine the issues presented and exercise the jurisdiction and authority of the State. The Petition was never ruled on.

50. On November 25, 1998, Petitioners filed their Joint Notice of Appeal from the Order of October 26, 1998. The Nevada Supreme Court assigned the appeal Case No. 33419.

51. On December 1, 1998, an Order related to the November 9, 1998 hearing and bearing the signatures of Stephen Huffaker and Lee Gates, was entered in the records of the case, ordering the Clerk of the Court to close the case and abide by the Order of Dismissal previously made in the case on February 28, 1995 (despite the fact that the Nevada Supreme Court had determined that the case was "technically still pending" as of November 21, 1995, see ¶ 38, supra); granting sanctions in the form of attorney's fees against Petitioner and in favor of Defendants BUD MAHAS and

DOUGLAS R. MALAN, in the amount of $1,000, and in the amount of $500.00 to every other joining Defendant consisting of the INTERNATIONAL MONETARY FUND; striking all of Petitioners Motions after February 28, 1995 as fugitive documents; and enjoining Petitioners from filing any papers or pleadings whatsoever in this case. (**Apdx. O65-O67**, Order of December 1, 1998).

52. The Order of December 1, 1998, is subject to Writ of Certiorari, or other appropriate Writ.

53. On December 18, 1998, an Order related to the November 9, 1998 hearing signed by Stephen Huffaker was entered into the records of the case, ordering the Clerk of the Court to close the case and abide by the Order of Dismissal previously made in the case on February 28, 1995; granting sanctions in the form of attorney's fees against Petitioner and in favor of joining Defendants CONAM MANAGEMENT, JOHN L. THORNDAL, and BLAIR C. PARKER, in the amount of $500.00; striking all of Petitioners' Motions filed after February 28, 1995 as fugitive documents; and enjoining Petitioners from filing any papers or pleadings whatsoever in the case. (**Apdx. P68-P70**, Order of December 18, 1998).

54. The Order of December 1, 1998, is subject to Writ of Certiorari, or other appropriate Writ.

55. In his Orders of December 1, 1998 and December 18, 1998, Respondents, Stephen Huffaker and Lee Gates, relied on the determinations of Lee Gates on February 28, 1995. The Order pertaining to said determinations of Lee Gates was entered in the records of the case on May 4, 1995. See **Apdx. J46-J48**.

56. On January 13, 1999, Petitioners made an application for Writ of Certiorari to the Supreme Court of the State of Nevada, which was assigned Case No. 33601.

57. On January 13, 1999, Petitioners filed their Joint Notice of Appeal from the Orders of March 4, 1995, December 1, 1998, and December 18, 1998, as entered in State District Court Case No. A323777, CR#s 373, 374. The Nevada Supreme Court assigned the appeal Case No. 33684.

58. On March 8, 1999, the Supreme Court of the State of Nevada entered its Order denying a non-existent petition for "writ of mandamus" (**Apdx. A3**), perhaps denying the Writ of Certiorari, Case No. 33601, and denying the appeals 33419 and 33684 before they were filed in the Court, and directing the Court Clerk to refuse to file any pleadings or documents submitted by Petitioners, and sanctioning Robert Kahre 3000 for submitting a frivolous application for Writ of Certiorari. See **Apdx. A1-A5**.

59. On March 24, 1999, Petitioners submitted an appeal brief for review and determination by the Nevada Supreme Court for Case No. 33684. The brief was returned by the Clerk of Court without being filed, leaving Petitioners without any plain, speedy or adequate remedy.

JURISDICTION

Petitioners move for review on certiorari of the March 8, 1999 Order of the Nevada Supreme Court entered in Kahre v. IMF, et al., Case No. 33601 entered, **Apdx. A1-A5** (which denied Kahre's application for a writ of certiorari, and which also dismissed related appeals, Case Nos. 33419 and 33684 before the Nevada Supreme Court), and following related Orders: the January 10, 1994 Order entered by Philip M. Pro in the records of USDC Case No. CV-S-93-1054-PMP, **Apdx. D31-D33**; the January 11, 1994 Order entered by Philip M. Pro in the records of USDC Case No. CV-S-93-

1054-PMP, **Apdx. E34-E35;** the April 27, 1994 Order issued by State District Court, Don Chairez in Case No. A323777, **Apdx. C29-C30**; the August 30, 1994 Order entered by David Hagen in the records of USDC Case No. CV-S-93-1054-PMP, **Apdx. F36-F37;** the Order entered January 3, 1995 by Respondent, USDC, Lloyd D. George, III in USDC Case No. CV-S-93-1054 LDG, **Apdx. H40-H41**; the Order entered February 16, 1995 by Respondent, USDC, Lloyd D. George, III, in Case CV-S-93-1054 LDG, **Apdx. G38-G39**; and the Order entered February 24, 1995 by Respondent, USDC, Lloyd D. George, III, in Case CV-S-94-1009 LDG, **Apdx. I42-I45**.

Jurisdiction is invoked pursuant to 28 U.S.C. 1257, or in the alternative 28 U.S.C. 1651. 28 USC § 2403(a) may apply in this case. To the best of Petitioners' knowledge, no court of the United States has certified the Attorney General that the constitutionality of an Act of Congress was draw into question.

CONSTITUTIONAL AND STATUTORY PROVISIONS

The Constitutional provisions, international agreements, and statutes involved in the case are voluminous, and are therefore contained in the Appendix to this Petition, as follows:

1. Constitution for the United States of America Article I, Section 8, Clause 1, see **Apdx. S93**.
2. Constitution for the United States of America Article I, Section 8, Clause 5, see **Apdx. S93**.
3. Constitution for the United States of America Article I, Section 9, Clause 7, see **Apdx. S93**.
4. Constitution for the United State of America, Article IV, Section 2, Clause 1, see **Apdx. S93**.

5. Constitution for the United States of America, Article VI, Clause 2, see **Apdx. S94**.
6. Constitution for the United States of America, Amendment V, see **Apdx. S94**.
7. Constitution for the United State of America; Amendment VII, see **Apdx. S94-S95**.
8. Articles of Agreement of the International Monetary Fund, Article IX, Section 3, 60 Stat. 1413, see **Apdx. U97-U99**.
9. 28 U.S.C. 1349, see **Apdx. U100**.
10. Gold Reserve Act of 1934, 73d Congress, Session II, Chapter 6, Section 10(b), see **Apdx. Z104**.
11. Special Drawing Rights Act of 1968, Public Law 90-349, 82 Stat. 188, Sections 3 & 4, , see **Apdx. AA105-AA106**.
12. Foreign Sovereign Immunities Act of 1976, 28 U.S.C. 1603(b), see **Apdx. W101**.
13. Foreign Sovereign Immunities Act of 1976, 28 U.S.C. 1605(a)(2), see **Apdx. X102**.
14. 28 U.S.C. 2410(a), see **Apdx. Y103**.
15. Public Law 88-633, 78 Stat. 1009, Part III, Chapter I, Section 301(c)(4), see **Apdx. BB107**.
16. Constitution for the State of Nevada, Article 1, Section 2, see **Apdx. T96**.
17. Constitution for the State of Nevada, Article VI, Section 6, see **Apdx. T96**.

STATEMENT OF THE CASE

Petitioner, Robert Kahre commenced an action at law in the State District Court to obtain redress of grievance and

remedy for the unlawful and wrongful taking of real and personal property located within the State, Case No. A 323777. The principal instrumentalities, the International Monetary Fund (IMF) and the International Bank for Reconstruction and Development (The World Bank) were named as parties, along with their corporator, the United States (de facto), and their agents. The Gold Reserve Act of 1934, Section 10(b), as amended by the Special Drawing Rights Act of 1968, and the Exchange Stabilization Fund created thereunder, were an integral part of a systematic scheme complained of by Kahre, which was the proximate cause of damages to Kahre and others. Petitioner John B. Nelson later joined the case.

The case was removed to U.S. District Court under the continued jurisdictional objections of Petitioners and as filed in the State District Court. The question of whether the immunities and powers granted to the International Monetary Fund (IMF) are in contravention of the Constitution for the United States of America and related matters were raised early on in the State District Court proceedings in Case A323777, as were direct jurisditional objections. See State District Court Case No. A323777, "Denial of Waiver of Jurisdiction; Objection to Removal and to Extension of Time and Praecipe", CR# 25; and "Plaintiff's Replication and Response to Defendant, Nevada State Bank's "Motion to Dismiss Compliant and for Imposition of Sanctions" and Praecipe", CR # 30. The U.S. District Court does not have personal jurisdiction over the IMF according to the Articles of Agreement of the IMF, Article IX, Section 3, **Apdx. U97**, and does not have jurisdiction over its commercial transactions as executed under the Gold Reserve Act of 1934, Section 10(b), **Apdx. Z104**,i.e., the Exchange Stabilization

Fund, as amended by the Special Drawing Rights Act of 1968, **Apdx. AA105-AA106**. The United States (de facto), as corporator and voting share stockholder in The IMF and The World Bank, does not own over fifty (50%) percent of the corporate stock thereby precluding the U.S. District Court from entertaining the action under 28 U.S.C. 1349, **Apdx. V100**. The judgments and orders of the U.S. District Court in Cases CV-S-93-1054PMP and CV-S-94-1009-LDG are void for want of jurisdiction over the persons and subject matter in issue. The merits of the case have not been addressed. No findings of fact or conclusions of law appear in the record. At this time, the character and capacity of numerous defendants has not been determined, and no certification of such character and capacity has been placed in evidence at any time.

THE RULINGS BELOW

After the unlawful removal, Petitioner made application by appeal and writ to the Nevada Supreme Court. See Nevada Supreme Court Cases 27558 and 27521. The State Supreme Court determined that the case was "technically still pending" in the State District Court. (**Apdx. K51**). Petitioner thereafter amended the complaint, and default was entered against several of the named defendants, including the IMF, The World Bank, and their collection agents. The case was thereafter dismissed in the State District Court upon grounds that it had been removed to U.S. District Court, in contravention of the Nevada Supreme Court's November 21, 1995 Order, **Apdx. K51**. On November 25, 1998, Petitioners filed their Joint Notice of Appeal from the Order of October 26, 1998 in State District Court Case A323777, CR #358. The Nevada Supreme Court

assigned the appeal Case No. 33419. On January 13, 1999, Petitioners filed their Joint Notice of Appeal from the Orders of March 4, 1995, December 1, 1998, and December 18, 1998, as entered in State District Court Case No. A323777, CR# 373, 374.

The Nevada Supreme Court assigned the appeal Case No. 33684. The questions presented on appeal in Nevada Supreme Court Case No. 33419 are summarized under **Apdx. Q71**. The questions presented to the Nevada Supreme Court in Case No. 33684 are moot as the Clerk refused to file Petitioners' opening brief as per Order of the Court. Said Opening Brief will be provided to this court upon demand.

Petitioner thereafter made application for writ of certiorari to the Nevada Supreme Court on January 13, 1999, assigned Case No. 33601. The issues presented to the Nevada Supreme Court via said petition for writ of certiorari are summarized under **Apdx. R72-R92**.

On March 8, 1999, the Nevada Supreme Court denied a non-existent petition for writ of mandamus. See **Apdx. A3**. The court may also have denied the application for the Writ of Certiorari as filed by Petitioners, and also denied the appeals in Cases 33419 and 33684 which had not even been filed yet. The appeals were dismissed before the briefs were filed with the Clerk of Court. The jurisdictional issues are raised herein. Petitioners are left without any plain, speedy, adequate or pacific remedy.

REASONS FOR GRANTING THE WRIT

ISSUE I.

The USDC unlawfully assumed jurisdiction over a case

in which the IMF was a party, and in contravention of the Articles of Agreement of the IMF.

Robert Kahre commenced an action at law in the District Court, Clark County, State of Nevada, as secured by the Constitution for the United States of America, Article IV, Section 2, and Amendment VII, **Apdx. S93-S95**. Corfield v. Coryell, 6 Federal Cases 546 (1823). The IMF and The World Bank were named in the original State Court action as principal actors in a systematic scheme which was used to deprive Kahre of his property and rights to property as located in the State of Nevada. The issues included, but were not limited to, the collection of contributions under pretense of tax for purposes other than those enumerated in the Constitution for the United States of America, Article I, Section 8, Clause 1, **Apdx. S93**. Flast v. Cohen, 392 U.S. 83, 20 L.Ed.2d 947, 88 S.Ct. 1942 (1968). The World Bank plead that: (1) the United States was a stockholder along with 175 other Nations; (2) The World Bank is capitalized by its members, including the United States; (3) The World Bank borrows money, sells bonds, and lends money; (4) that the funds obtained from the United States were used to make loans and guarantees to other Nations; (5) membership in The World Bank was limited to those that are members in the IMF. (**Apdx. CC108-CC115**, Case No. CV-S-93-01054-PMP, Memorandum Of Points And Authorities In Support Of Defendant's Motion To Dismiss For Lack Of Personal Jurisdiction And Failure To State A Claim, CR # 28). The IMF, The World Bank, and its corporators were involved in commercial activity in other countries, and that activity had a direct effect in the United States. (28 U.S.C. 1605(a)(2), **Apdx. X102**; Argentina v. Weltover, 504 U.S. 607, 119

L.Ed.2d. 394, 112 S. Ct. 2160 (1992). The IMF and The World Bank are the instrumentalities within the meaning of 28 U.S.C. 1603(b). **Apdx. W101**. Entry of default was entered against the IMF and The World Bank in the State District Court. See **Apdx. DD116-DD119**.

The IMF and The World Bank have an interlocking Board of Governors, including the Secretary of Treasury. The United States was named in its capacity as a corporator and voting share stockholder in the IMF and The World Bank, not in its sovereign character and capacity. (Alfred Dunhill of London v. Cuba, 425 U.S. 682, 48 L.Ed.2d 301, 96 S.Ct. 1854 (1976); Bank of the United States v. Planters Bank of Georgia, 9 Wheat 904, 6 L.Ed. 244 (1824). The named agents were acting under the direction and control of the Secretary of Treasury, one of the seven Governors of the IMF and The World Bank. Entry of default was entered against the agents in the State District Court. See **Apdx. DD120-DD129**.

After commencing the action in the State District Court, U.S. Attorney, Kathryn Landreth attempted to remove the case to U.S. District Court. Robert Kahre objected to the removal in the State Court upon jurisdictional grounds. Case No. A323777, CR#s 25, 30. The IMF refused personal service of the summons and complaint. The IMF claims immunity from the judicial process of the United States under Articles of Agreement of the International Monetary Fund, Article IX, Section 3, 60 Stat. 1413, **Apdx. U97**, and in effect, that the international lending institution is not "under Authority of the United States" in contravention of the Constitution for the United States of America, Article VI, Clause 2, **Apdx. S94**.

No hearings or discovery were ever had in the U.S.

District Court, and while lacking personal jurisdiction over the principals, the IMF and World Bank, the U.S. District Court, dismissed the case as against all the parties that aided, abetted, counseled, commanded, procured, or furthered the systematic scheme complained of. (**Apdx. D31-I45**, Case No. CV-S-93-1054 PMP Orders of January 10, 1994, January 11, 1994, August 30, 1994, January 3, 1995, February 16, 1995, February 24, 1995).

The removal of the case from State District Court to the U.S. District Court was in excess of authority and unlawful. The orders of the U.S. District Court are void and of no effect for want of personal jurisdiction over the principal instrumentality. The Nevada State Court, while relying on the removal to U.S. District Court, denied Robert Kahre's legal arguments and refused to entertain the action and determine the issues on their merits, thereby depriving Petitioner of his right to due process and equal protection of the law. 28 U.S.C. 1605(a)(2).**Apdx. X102**; Public Law 88-633, 78 Stat. 1009, Part III, Chapter I, Section 301(c)(4), supra, **Apdx. BB107**; Corfield v. Coryell, 6 Federal Cases 546 (1823); Flast v. Cohen, 392 U.S. 83, 20 L.Ed.2d 947, 88 S.Ct. 1942 (1968).

ISSUE II.

The USDC unlawfully assumed jurisdiction over the IMF and World Bank when the United States does not own more than fifty (50%) percent of the voting share stock in the instrumentalities, and in contravention of 28 U.S.C. 1349

Robert Kahre objected to the removal of the case to U.S. District Court upon grounds that the United States does not own sufficient capital stock in the IMF and The World

Bank. See "Denial Of Waiver Of Objection To Removal And Extension Of Time And Praecipe", pg. 5, lines 2 - 7 and 24 - 27, Case No. A323777, CR # 25. Robert Kahre served subpoenas on The World Bank, the IMF, and the United States requesting the production of the voting share stocks, loan and loan guarantee contracts, an accounting of public funds, and other jurisdictional documents on several occasions. See Case No. A323777, CR#s 201 - 219, and ¶ 42, supra. The documents and accounting were never produced and the State District Court did not enforce the subpoenas. The pleadings of the instrumentalities and their corporator are properly deemed to be untrue. Insurance Corp. of Ireland v. Compagnie Des Bauxite De Guinea, 456 U.S. 694, 72 L.Ed.2d 492, 102 S.Ct. 2009 (1982).

The Court will take judicial notice that the United States only held 19.96 percent of the voting share stock in the IMF in 1976. (Public Law 94-564, 90 Stat. 2660, Senate Report 94-1148, Congressional & Administrative News, pgs. 5955 & 5957). 28 U.S.C. 1349 is clear and unambiguous.

> "The [U.S.] district courts shall not have jurisdiction of any civil action by or against any corporation upon the grounds that it was incorporated by or under an Act of Congress, unless the United States is the owner of more than one-half of its capital stock."

The U.S. District Court does not have jurisdiction over the IMF and The World Bank as instrumentalities. The United States does not have sufficient capital stock in the IMF and The World Bank to sustain an action in the U.S. District Court .

The removal of case A323777 from State District Court to the U.S. District Court in Cases CV-S-93-1054PMP and CV-S-94-1009 LDG was in excess of authority and unlawful. The orders of the U.S. District Court are void and of no effect for want of personal jurisdiction over the principal instrumentalities. The Nevada State Court, while relying on the removal to U.S. District Court, denied Robert Kahre's legal arguments and refused to entertain the action and determine the issues on their merits, thereby depriving Petitioner of due process and equal protection of the law. 28 U.S.C. 1605(a)(2), **Apdx. X102**; Public Law 88-633, 78 Stat. 1009, Part III, Chapter I, Section 301(c)(4), **Apdx. BB107**; Corfield v. Coryell, 6 Federal Cases 546 (1823); Flast v. Cohen, 392 U.S. 83, 20 L.Ed.2d 947, 88 S.Ct. 1942 (1968).

ISSUE III.

The judges of the USDC lack subject matter jurisdiction over the "Exchange Stabilization Fund" (ESF) as created under the Gold Reserve Act of 1934, Section 10(b), and as amended by the Special Drawing Rights Act of 1968.

The issues raised in the complaint, as amended, and the systematic scheme complained of pertained to the acts and omissions of the named instrumentalities, their corporator, the United States, and their agents. The "Exchange Stabilization Fund" created under section 10(b) of the Gold Reserve Act of 1934, and as amended by the Special Drawing Rights Act of 1968, are an integral and inseparable part of that scheme. See **Apdx. Z104-AA106**.

U.S. District Court judges are officers of the United States. U.S. v. Claiborne, 727 F.2d 842 (1984). Section 10(b) of the Gold Reserve Act of 1934, **Apdx. Z104,** expressly

states that the Exchange Stabilization Fund and its operations are excluded and immune from review by any officer of the United States. The amendment of the Gold Reserve Act by the Special Drawing Rights Act of 1968, did not change the exclusion, **Apdx. AA105-AA106**. The fact that the Special Drawing Rights transactions are accomplished through a "certificate", i.e., an international letter of credit, is indisputable. The fact that the "Exchange Stabilization Fund" and SDRs are used to provide financial aid and assistance to foreign countries, is also indisputable, right along with the fact that the American taxpayer is the ultimate party providing the initial contributions for loans, grants, and guarantees, and further, is held liable for payment of defaults on such loans and guarantees.

The U.S. District Court judges lack authority to review the issues concerning the scheme, as a matter of law. The removal of the case from State District Court to the U.S. District Court was in excess of authority and unlawful. The orders of the U.S. District Court are void and of no effect for want of subject matter jurisdiction. The Nevada State Court, while relying on the removal to U.S. District Court, denied Robert Kahre's legal arguments and refused to entertain the action and determine the issues on their merits, thereby depriving Petitioners of due process and equal protection of the law. 28 U.S.C. 1605(a)(2),**Apdx. X102**; Public Law 88-633, 78 Stat. 1009, Part III, Chapter I, Section 301(c)(4), **Apdx. BB107**, Corfield v. Coryell, 6 Federal Cases 546 (1823); Flast v. Cohen, 392 U.S. 83, 20 L.Ed.2d 947, 88 S.Ct. 1942 (1968).

ISSUE IV.

The State District Court has jurisdiction over the IMF

and The World Bank as instrumentalities and its corporators in accordance with the Foreign Sovereign Immunities Act, 28 U.S.C. 1605(a)(2).

Petitioner Robert Kahre commenced an action at law in the State District Court which had jurisdiction over the persons and subject matter in issue, in accordance with the Constitution for the State of Nevada, Article VI, Section 6, **Apdx. T96**, and as subject to the mandates of the Constitution for the State of Nevada, Article 1, Section 2, **Apdx. T96**. The named defendant instrumentalities and their corporator, the United States (de facto), were engaged in commercial activity, as admitted by The World Bank. (**Apdx.CC108-CC115**, Case No. CV-S-93-01054-PMP, Memorandum Of Points And Authorities In Support Of Defendant's Motion To Dismiss For Lack Of Personal Jurisdiction And Failure To State A Claim, CR# 28); Argentina v. Weltover, 504 U.S. 607, 119 L.Ed.2d. 394, 112 S. Ct. 2160 (1992). The initial funds to engage in the international lending scheme were obtained from the American taxpayers. When foreign countries default on the loans and extensions of credit, the defendant instrumentalities and their corporator, the United States, sought and obtained contributions from the American taxpayer to pay the debts of foreign countries, thereby causing a direct effect in the United States. The funds are obtained through the collection activities of the Governor of the IMF and The World Bank, the Secretary of Treasury, and his agents. The issue raised in the complaint, as amended, as to whether it is beyond the delegated powers of Congress to lay and collect taxes for the common defense and general welfare of foreign countries, and to pay their debts under the Bretton Woods Agreement has

not been determined. Cermak v. Bata Akovia Spolecnost, 80 NY2d 782, affd. 275 App. Div. 919, 43 NE 988.

Robert Kahre complained that the collection activities and liens, which clouded title to real and personal property in the State of Nevada, and the subsequent sale and conversion of said property under pretense of the United States, was in fact intended to further a systematic scheme to solicit and collect information, contributions, money, loans, or other things of value for or in interest of foreign principals and powers, and that said activity was in contravention of the Constitution for the United States of America, Article I, Section 8, Clause 1, **Apdx. S93**, and existing domestic law. 18 U.S.C. 219.

The Foreign Sovereign Immunities Act of 1976, as codified at 28 U.S.C. 1605(a)(2), **Apdx. X102.** expressly acknowledges that the courts of the State have jurisdiction over a foreign State, and their commercial activities which have a direct impact in the United States. Foreign State includes an "instrumentality." 28 U.S.C. 1603(b), **Apdx. W101.** The World Bank and the IMF are separate legal entities according to their corporate charters and the privileges and immunities declared therein. The World Bank plead that it has 176 countries as stockholders, and it is reasonably presumed from the same pleading that there are at least 176 countries that are stockholders in the IMF. A majority of the voting share stock is held by foreign countries or political subdivisions. 28 U.S.C. 1603(b)(2), **Apdx. W101**. The United States is only one of the voting share stockholders, and was sued in that capacity, not in its sovereign character and capacity. (Alfred Dunhill of London v. Cuba, 425 U.S. 682, 48 L.Ed.2d 301, 96 S.Ct. 1854 (1976); Bank of the United States v. Planters Bank of Georgia, 9

Wheat 904, 6 L.Ed. 244 (1824). The IMF articles of incorporation claim immunity from: (1) the judicial, executive, and legislative action of any member country; (2) the imposition of taxes on its property, assets, and securities, or on its officers, or employees; (3) immunity from search, seizure, expropriation, or other takings; and further, claims the absolute inviolability of its papers and records. The entities are not citizens of a State of the United States, were not created "under the Authority of the United States" in accordance with the Constitution for the United States of America, Article VI, Clause 2, and were not created "under" the laws of any country. 28 U.S.C. 1603(b)(3). See **Apdx. S94, W101**.

The statutory limitations upon review of the Exchange Stabilization Fund by any officer of the United States, as imposed under Section 10(b) of the Gold Reserve Act of 1934, and as amended by the Special Drawing Rights Act of 1968, supra, do not apply to officers of a State, including judicial officers of the State. Likewise, Public Law 88-633, 78 Stat. 1009, Part III, Chapter I, Section 301(c)(4), **Apdx. BB107**, directs that no court in the United States can decline to determine a case on the merits because a taking or expropriation was committed under pretense or pretext of an "act of state." Public Law 88-633, Section 301(c)(4) was read into the records during the State District Court hearing held on April 18, 1994. **Apdx. B18, line 25 - B19, line 17**. The State District Court refused to hear or determine the merits of the case.

The State Court's jurisdiction to determine the validity of tax liens filed in the State is also recognized. 28 U.S.C. 2410, Popp v. Eberlien, 409 F.2d 309 (1969); Kelly v. Lunding, 475 N.E.2d 1093 (1985); Elfelt v. Cooper, 471

N.W.2d 303 (1991); Ruff v. Issac, 573 N.W.2d 55 (1997) The unlawful taking of certain real property is again before the State District Court in James W. Anderson v. Robert Kahre, Case No. A396749. Anderson was one of the unknown Does named in the original complaint in Case no. A323777. The real property in issue is the same in both cases, the parties are the same, and several of the issues are the same.

The State District Court in Anderson has determined that it has jurisdiction over the property in question, and that there was a taking. See Transcript of March 15, 1999 hearing in State District Court Case No. A396749, **Apdx. EE130-EE134**. The usurpation by U.S. District Court and the refusal of the State District Court to hear and determine the cause on the merits has cause multiplicity of actions. Of no less importance, it establishes a long train of abuses and double standards which have been consistently used against Robert Kahre to prejudice and abrogate his rights.

As shown, the State Court has jurisdiction over the person of all the defendants and over the subject matter in issue and can provide remedy. Nevertheless, the Nevada State Court, while relying on the unlawful and improvident removal to U.S. District Court, denied Robert Kahre's legal arguments and refused to entertain the action and determine the issues on their merits, thereby depriving Petitioner of due process and equal protection of the law. 28 U.S.C. 1605(a)(2), **Apdx. X102**; Public Law 88-633, 78 Stat. 1009, Part III, Chapter I, Section 301(c)(4), **Apdx. BB107**, Corfield v. Coryell, 6 Federal Cases 546 (1823); Flast v. Cohen, 392 U.S. 83, 20 L.Ed.2d 947, 88 S.Ct. 1942 (1968).

ISSUE V.

The immunities and powers granted to the IMF are in contravention of the Constitution for the United States of America. Congress created a corporate entity that is not "under Authority of the United States"; granted it special privileges, immunities, and franchises; became a corporate stockholder and member; and thereafter devise a systematic scheme to do not only what their legislative powers do not authorize but what they forbade.

Petitioners complained of the systematic scheme devised by and between the defendant international organizations and their corporators. The scheme was implemented and enforced as against Petitioners, and was the proximate cause of the damages which gave rise to the action. The IMF was instrumental and inseparable in this scheme. The IMF claims immunity from the judicial, legislative, and executive action of any voting share stockholder and member. The immunity is claimed under Article IX of the Articles of Agreement of the International Monetary Fund, 60 Stat. 1413, 1414, **Apdx. U97-U99**. The United States is a voting share stockholder in the IMF, along with at least 176 other countries, and has given effect to the agreement throughout and within the United States.

The IMF also claims under Article IX that it is exempt from any form of taxation, search, seizure, taking or expropriation of any of its property, assets, securities, etc., and that its records are inviolable. The systematic scheme as complained of by Petitioner was inseparable from the IMF and its corporators. The Exchange Stabilization Fund created under the Section 10(b) of the Gold Reserve Act of 1934, and

as amended by the Special Drawing Rights Act of 1968, (**Apdx. Z104-AA106**) are an integral and inseparable part of said scheme. The systematic scheme complained of was and is patently unconstitutional upon numerous grounds, including but not limited to, the Articles of Agreement of the IMF are not *"under authority of the United States"*, in accordance with the Constitution for the United States of America, Article VI, Clause 2, **Apdx. S94**.

The IMF regulates the value of money in the member countries, including the United States. The Constitution for the United States of America, Article I, Section 8, Clause 5, **Apdx. S93**, expressly delegates the power and obligation to regulate the value of money in the United States, and that of foreign coin, to Congress.

No public accounting of the receipts and expenditures of contributions collected from the taxpayers is available, or will be made available under Article IX, Sections 3, 4, 5, 6, 7, and 8 of the Article of Agreement of the IMF, **Apdx. U97-U99**, all in contravention of the Constitution for the United States of America, Article I, Section 9, Clause 7.

The immunity from taxation declared in Article IX, Section 9, of the corporate Agreement of the IMF is in contravention of the uniformity clause in Article I, Section 8, Clause 1 of the Constitution for the United States of America. See **Apdx. S93**.

The Articles of Agreement of the IMF, as amended, are patently unconstitutional, along with the systematic scheme which was devised, implemented, and enforced against Petitioner by the Governor of the IMF, the Secretary of Treasury, its corporator, the United States, and their agents. Any grant of special privileges, immunities, or franchises to a corporation are subject to Constitutional

scrutiny and limitations. Osborn v. The Bank of the United States, 6 (9 Wheat) L.Ed. 204 (1824).

The Articles of Agreement of the IMF, and the complained of systematic scheme have left Petitioner without right or plain, speedy, adequate, or pacific remedy, and wholly in want of justice under the Law of the Land.

CONCLUSION

For the foregoing reasons, the Petitioners respectfully pray that the petition for a writ of certiorari be granted.

Dated this 4th day of June, 1999.

Respectfully submitted by Petitioners Robert Kahre and John B. Nelson, herein.

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